

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EMANUEL PRELDAKAJ, on behalf of himself and  
all others similarly situated,

Plaintiff,

-v.-

THE MONARCH CONDOMINIUM, THE MONARCH  
CONDOMINIUM BOARD OF MANAGERS and  
LASALA MANAGEMENT, INC.,

Defendants.

**DECLARATION OF  
STEPHEN P. PISCHL IN  
SUPPORT OF JOINT  
MOTION FOR FINAL  
APPROVAL OF  
SETTLEMENT**

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Case No. 1:20-cv-09433 (VSB)

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**STEPHEN P. PISCHL**, an attorney duly admitted to practice law in all the Courts of the State of New York and before the United States District Court of the Southern District of New York, hereby declares the following to be true, under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am Counsel with the firm of Clifton Budd & DeMaria, LLP, attorneys for the Monarch Condominium, the Monarch Condominium Board of Managers and LaSala Management, Inc., the defendants in this action (hereinafter “Defendants”). As such, I am fully familiar with the facts and circumstances of this action and stated herein.

2. After the parties reached a settlement of this dispute, on behalf of Defendants, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 *et seq.*, on Wednesday, November 17, 2021, our office served notice to the Honorable Merrick B. Garland, United States Attorney General, of the settlement for which the parties now seek final approval. A true and correct copy of this notice as it was served by my office, without its attached exhibits, is annexed hereto as **Exhibit A**. The notice advised the Attorney General that this Court had scheduled a fairness hearing on the parties’ settlement for March 24, 2022.

3. On Thursday, October 28, 2021, our office also served notices to the New York Attorney General of the settlement for which the parties now seek final approval. According to Defendants' records, New York is the state in which all identified class members reside. True and correct copies of these notices to each state attorney general as they were served by my office, without their attached exhibits, are attached as **Exhibit B**. This notice likewise advised the New York Attorney General that this Court had scheduled a fairness hearing on the parties' settlement for March 24, 2022.

4. Copies of affidavits attesting to the service of the above-referenced notices on November 17, 2021 are collectively attached hereto as **Exhibit C**.

5. As of the date of this Declaration, more than ninety days have elapsed since the notices were served and Defendants have not received any indication from the United States Attorney General, the New York Attorney General, that any of the recipients of Defendants' notices or any other person or entity would object to the Settlement Agreement reached between the parties.

**WHEREFORE**, I respectfully request that this Court (1) grant final approval of the parties' Settlement Agreement; and (2) Order that the requirements of the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 *et seq.*, have been satisfied.

Dated: March 9, 2022  
New York, New York

  
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Stephen P. Pischl